Case 1:12-cv-00090-LG-JMR Document 2 Filed 04/03/12 Page 1 of 39

Karen Ladner Ruhr

HANCOCK COUNTY CIRCUIT CLERK 152 MAIN STREET, SUITE B BAY ST. LOUIS, MISSISSIPPI 39520

228-467-5265 228-467-5266 228-467-2779 Fax

GULFPORT: 228-868-1913 TOLL FREE: 1-800-771-9942

CERTIFICATE OF CLERK AS TO CERTIFIED COPY

STATE OF MISSISSIPPI

COUNTY OF HANCOCK

I, Karen Ladner Ruhr, Clerk of the Circuit Court of the said County and State, hereby certify that the foregoing pages contain a true and correct copy of the file from the Circuit Court of said County and State in Cause number 12-0103 Styled:

TROUT POINT LODGE LIMITED, A Nova Scotia Limited Company VAUGHN PERRET AND CHARLES LEARY

DOUG K. HANDSHOE

as the originals of same appear of record and file in my office.

Given under my hand and official seal affixed, this the 28TH day of March, 2012.

KAREN LADNER RUHR HANCOCK COUNTY

CIRCUIT CLERK

BY. 1 - Corr

IN THE CIRCUIT COURT OF HANCOCK COUNTY

STATE OF MISSISSIPPI

TROUT POINT LODGE, LIMITED, A Nova Scotia Limited Company; VAUGHN PERRET and CHARLES LEARY,	MAR 2 6 2012 KAREN LADNER RUHR CIRCUIP CLEAR HANCOCK CO. BY
Plaintiff,	
v.) Civil Action No.: 12-0103
DOUG K. HANDSHOE,))
Defendant.)

NOTICE OF FILING NOTICE OF REMOVAL

Defendant, by its undersigned counsel, hereby gives notice that it has filed a Notice of Removal in the United States District Court for the Southern District of Mississippi in the case styled Trout Point Lodge, Limited, A Nova Scotia Limited Company; Vaughn Perret and Charles Leary v. Doug K. Handshoe, Civil Action No. 12-0103. A copy of the Notice of removal is attached as Exhibit "1".

DATED: March 23, 2012

G. GERALD/CRUNHIRD, Esquire

Mississippi Bar No. 7926 G. GERALD CRUTHIRD, P.A.

Attorneys at Law P. O. Box 1056

121 Fourth Street

Picayune, MS 39466

Telephone: (601) 798-0220

Facsimile: (601) 798-4591 Email: ggeraldc@bellsouth.net

COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify I have mailed (via U.S. Mail) a copy of the foregoing Notice of Filing Notice of Removal to the following:

Henry Laird, Esquire
Mississippi Bar No. 1774
Jones, Walker, Waechter, Poitevent,
Carrere & Denegre, LLP
2510 14th Street, Suite 1125 (39501)
Post Office Drawer 160
Gulfport, MS 39502
Telephone: (228) 864-3094
Facsimile: (228) 864-0516

Facsimile: (228) 864-0516 Email: <u>hlaird@joneswalker.com</u>

Attorneys for Plaintiff

THIS the $2\sqrt{\frac{t}{6}}$ day of March, 2012.

G. GERALD CRUTHURD

FOR THE SOUTHE	STATES DISTRICT COURT RN DISTRICT OF MISSISSIPP HERN DIVISION SOUTHERN DISTRICT OF MISSISSIPP MAR 2 6 2012 JT MOBILIN CLERK DEPUTY
TROUT POINT LODGE, LIMITED,)
A Nova Scotia Limited Company;)
VAUGHN PERRET and)
CHARLES LEARY,)
YXY 1 (100)
Plaintiff,)
	Civil Action No.: 1/12CV90 LG-JMR
v.	Civil Action No.: 1.120 10 10 11
NATION TELBUNGATAR	
DOUG K. HANDSHOE,)
)
Defendant.)

DEFENDANT'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1441 et seq., Defendant, Doug K. Handshoe, files this Notice of Removal of the Civil Action filed against him by Plaintiffs, Trout Point Lodge, Limited, Vaughn Perret and Charles Leary, and states as follows:

- 1. On March 8, 2012, Plaintiffs' filed their Motion to Enroll Foreign Judgment in the lawsuit styled *Trout Point Lodge, Limited, A Nova Scotia Limited Company; Vaughn Perret and Charles Leary v. Doug K. Handshoe*, Civil Action No. 12-0103, in the Circuit Court of Hancock County, Mississippi.
- 2. The Defendant, Doug K. Handshoe, was served with notice of such filing on or about March 9, 2012.
- 3. Removal is proper under 28 U.S.C. § 4103, because Plaintiffs' suit involves a Federal question. Specifically, Plaintiffs have alleged defamation via the internet by Defendant in securing rendition of a foreign judgment against Defendant in the Supreme Court of Nova

Scotia, Canada on or about February 2, 2012; and in response thereto Defendant has filed his suit in this Court, styled Slabbed New Media, LLC, a Mississippi LLC, Douglas Handshoe vs. Trout Point Lodge, Limited, a Foreign Limited Company; Charles Leary and Vaughn Perret, Civil Action No. 1:12-CV-00038-RHW, filed in the United States District Court for the Southern District of Mississippi, Southern Division, under the provisions of the Securing The Protection Of Our Enduring and Established Constitutional Heritage Act, pursuant to 28 U.S.C. Sections 4101, et seq.

- 4. Venue is proper in this district under 28 U.S.C. § 1441(a) because the State Court where the action has been pending is located in this district.
- 5. This Notice is being filed with this Court within thirty (30) days after Defendant received a copy of Plaintiffs' initial pleading, Motion to Enroll Foreign Judgment.
- 6. Defendant would further show that true and correct copies of all process, pleadings and orders filed to date in the above described State Court action are attached hereto as Exhibit "A"; and that no other process, pleadings, or orders have been served upon Defendant to date in this action.
- 7. Defendant files this Notice without waiving any defenses to the claims asserted by Plaintiff or conceding that Plaintiffs' above described foreign judgment can be enrolled or enforced.
- 8. Defendant is filing contemporaneously with this Notice, a Notice of Filing Notice of Removal with the Clerk of the Circuit Court of Hancock County, Mississippi, informing the Clerk that this action is being removed. A copy of said Notice of Filing Notice of removal is attached as Exhibit "B".

Defendant prays that this Court take jurisdiction of this action to its conclusion, to the exclusion of any further proceedings in the State Court in accordance with the law. Defendant also prays for such other and further relief to which it may be justly entitled.

DATED: March 23, 2012

Respectfully Submitted,

G. CENALD CRUTHIRD, Esquire

Mississippi Bar No. 7926

G. GERALD CRUTHIRD, P.A.

Attorneys at Law P. O. Box 1056

121 Fourth Street

Picayune, MS 39466

Telephone: (601) 798-0220 Facsimile: (601) 798-4591

Email: ggeraldc@bellsouth.net

CO-COUNSEL FOR DEFENDANT

JACK E. "BOBBY" TRUITT, Esquire

The Truitt Law Firm, L.L.C. 149 North New Hampshire Street

Covington, LA 70433-3235 Telephone: (985) 327-5266

Facsimile: (985) 327-5252 Mobile: (985) 778-1973

Email: btruitt@truittlaw.com

CO-COUNSEL FOR DEFENDANT, APPEARING PRO HAC VICE

CERTIFICATE OF SERVICE

I hereby certify I have mailed (via U.S. Mail) a copy of the foregoing Defendant's Notice of Removal to the following:

> Henry Laird, Esquire Mississippi Bar No. 1774 Jones, Walker, Waechter, Poitevent, Carrere & Denegre, LLP 2510 14th Street, Suite 1125 (39501) Post Office Drawer 160 Gulfport, MS 39502 Telephone: (228) 864-3094

Facsimile: (228) 864-0516 Email: hlaird@joneswalker.com

Attorneys for Plaintiff

and have hand delivered a true and correct copy unto

Karen Ladner Ruhr Circuit Clerk of Hancock County, Mississippi 152 Main Street, Suite B Bay St. Louis, MS 39520

THIS the $\frac{2 i t^{k}}{2}$ day of March, 2012.

G. GERALD CRUTHIRD

CERTIFICATE OF CLERK

STATE OF MISSISSIPPI

COUNTY OF HANCOCK

1, Karen Ladner Ruhr, Circuit Clerk of the said County and State, hereby certify that the foregoing pages contain a true and correct copy of the complete file in Cause No.

12-0103 styled Trout Point Lodge et al versus Doug K. Handshoe as appears on file in my office this date.

Given under my hand official seal affixed, this the 14th day of March, 2012.

KAREN LADNER RUHR

CIRCUIT CLERK

HANCOCK COUNTY, MS

__{{}_{1}})(

Burkey No. 1704 LV.1.

IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI

TROUT POINT LODGE, LIMITED, A Nova Scotia Limited Company; VAUGHN PERRET and CHARLES LEARY

PLAINTIFFS

VERSUS

CAUSE NO: _12-0103

DOUG K. HANDSHOE

DEFENDANT

MOTION TO ENROLL FOREIGN JUDGMENT

COME NOW Plaintiffs/Judgment Creditors, Trout Point Lodge, Limited, Vaughn Perret and Charles Leary, and file this their Motion to Enroll Foreign Judgment against Defendant/Judgment Debtor, Doug K. Handshoe, and in support thereof would submit a true and correct copy of the Judgment as Exhibit "A" and the Affidavit of Henry Laird as Exhibit "B".

Respectfully submitted, this the 8th day of March, 2012.

Trout Point Lodge, Limited, Vaughn Perret and Charles Leary, Yudgment Creditors

MAR 0 8 2012

CERTIFICATE OF SERVICE

I, Henry Laird, do hereby certify that I have this day mailed by United States mail, postage prepaid, a true and correct copy of the foregoing Motion to Enroll Foreign Judgment to the following:

Doug K. Handshoe 345 Carroll Avenue Bay St. Louis, Mississippi 39520

This the 8th day of March, 2012.

Henry Lard MSB# 1774

Jones, Walker, Waechter, Poitevent,

Carrère & Denègre, LLP

2510 14th Street, Suite 1125 (39501)

Post Office Drawer 160

Gulfport, MS 39502

Telephone: (228) 864-3094 Facsimile: (228) 864-0516

Email: hlaird@joneswalker.com

2011

IF THE SUPREME COURT OF NOVA SCOTTA EIETWEEN:

Tripot Bolint Lodge Elimitad, a Nova Sco in Limited Company, Vaughn Parret & Charles Leary

- and -

Doug K. Handshos and Jary Dos

Defendants

7a.80,350

CROEN

Relative the Honourable Justice Suzanne Hood in charables:

of motion was made by Trout Point Lodge, Charles Leary, and Veoghan Petret for assessment of damages and injunctive relief against Doug K. Handshoe.

Having reviewed the affidavits of Charles Leary and Vaughan Parret, and having heard Charles Leary and Vaugnan Perret on behalf of the Plaintiffs in charrours, on the motion of Trout Point Lodge, Charles Leavy, and Vaughn Perret the following is ordered:

The Defendant Douglas K Handshoe of Mississippi as a joint and concurrent tortfeasor shall

pay to the plaintiffs the following damages:

to Trout Point Lodge; \$75,000 in general dameces

to Vaughan Perret, \$100,000 in general damages; \$50,000 in aggravated damaged; and \$25,000 in puntive damages;

to Chartes Leavy, \$100,000 in general damages; \$50,000 in aggravated damage4; and \$25,000 in punitive damages;

as well 35 costs of \$2,000.

In addition, I order a permanent injunction to issue against the Effendant, Douglas X. Handshoe, restraining him from disseminating, posting on the Internet or publishing, in any manuar whatscover, directly or indirectly, any statements or costs enist about the plain life, Trout Point Louge, Charles L. Leary, and Vaughan J. Perret. This injunction shall include the publication, circulation and promotion on the plog named Stabbed, and any similar or other publications. For further particularly, re defendant shall not publish or cause to be published or otherwise disservinete or distribute in m rmanner whatspever, whether by way of the Internet or other medium, any statement's or other computations which refer to the plaintiffs by name, depiction or description.

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> IN THE SUPPLEME COUPT OF MOVA SOCIAL i hereby certify that the foregring accoment is a true copy of the original.

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Case 1:12-cv-00090-LG-JMR Document 2 Filed 04/03/12 Page 12 of 39

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Issued Pervilor c. 2012

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IN THE CERCUIT COURT OF HANCOCK COUPER, MISSISSIPPI

AFFIDAVIT O	F HENRY LAIRD	
DOUG K. HANDSHOE		DEFENUANT
VERSUS	CAUSE NO:	
TROUT POINT LODGE, LIMITED, A Nor Limited Company; VAUGHN PERRET and CHARLES LEARY		PLAINTIFFS

STATE OF MISSISSIPPI COUNTY OF HARPISON

PERSONALLY APPEARED BEFORE ME the undersigned authority for the County and State aforesaid the within named Henry Laird of Jones, Walker, Wheehter, Pointevent, Carrère & Denègre, LLP, says the following things are true:

- 1. He makes this Affidavit on personal knowledge, representations of the Plaintiffs and upon the Order entered February 2, 2012 in the Supreme Court of Nova Scotia styled: Trout Point Lodge, Limited, a Nova Scotia Limited Liability Company, Vaughn Perret & Charles Leavy-and Doug K. Handshoe and Jane Doe, Yar. No: 353654.
- 2. Attached hereto as Exhibit "A" is a true, correct and certified copy of the Judgment in favor of "rout Point Lodge, Limited, Vaughn Perret & Charles Leary against Doug K. Handshoe.
- The name of the judgment debtor in the above styled case is Doug K. Harbite, and last known post office address is 345 Carroll Avenue, Bay St. Louis, Mississippi 19520. The post office address of the judgment creditors, Trout Point Lodge, Charles Leary and Vauglia for est is 139 Trout Point Road, Kemptville, NS BOW 140 Canada.

EXHIBIT
"B"

(GP000691.1)

Case 1:12-cv-00090-LG-JMR Document 2 Filed 04/03/12 Page 14 of 39

or other communications which refer to the plaintiffs by $mon \omega$, depiction or description. All such modulates is leastly ordered to be immediately removed from publication.

See Lingil west

ro vissociani

CENTEREDATE OF SERVICE

I, Ferry Laint, do hereby certify that I have this day milled by United States mail, postage property, a true and correct copy of the foregoing Motion to Erroll Foreign Judgment to the following:

Doug K. Handshoe 345 Carroll Avenue Bay St. Louis, Mississippi 39520

This the 8th day of March, 2012.

Henry Layd MSB# 1774

Jones, Walker, Waechter, Politevent,

Carrère & Denègre, LLP

2510 14th Street, Suite 1125 (39501)

Post Office Drawer 160 Gulfport, MS 39502

Telephone: (228) 864-3094 Facsimile: (228) 864-0516

Email: hlaird@joneswalker.com

1011

IN THE SUPREME COURT OF NOV A SOUTA BETWEEN:

Trout Point Lodgs, United, a Nova Scotla Limited Company, Vaughn Perret & Charles Leary

- and -

Doug K. Handshoe and Jane Doe

Defendants

ORDER

efore the Honourable Justice Suzanne Hood in chambers:

Yymotion was made by Tmut Point Lodge, Charles Leary, and Vaughan Perret for essessment of Samages and Injunctive relief against Doug K. Handshoe.

Having reviewed the affidavits of Charles Leary and Vaughan Perret, and having heard Charles Leary and Vaughan Perret on behalf of the Plaintiffs in chambers, on the motion of Trout Point Lodge, Charles Leary, and Vaughan Perret the following is ordered:

The Defendant Douglas K Handshoe of Mississippi as a joint and concurrent tortleasor shall

pay to the plaintiffs the following damages:

to Trout Point Lodge: \$75,000 in general damages

to Vaughan Perret, \$100,000 in general damages; \$50,000 in aggravated damages; and \$25,000 in punitive damages;

to Charles Leary, \$100,000 in general damages; \$50,000 in aggravated damages; and \$25,000 in punitive damages;

as well as costs of \$2,000.

In addition, I order a permanent injunction to issue against the defendant, Douglas A. Handshoe, restraining him from disseminating, posting on the Internet or publishing, in any connect whatsoever, directly or indirectly, any statements or comments about the plaintiffs, Trout Point Lodge, Charles L. Leary, and Vaughan J. Perret. This injunction shall include the publication, circulation and promotion on the blog named Slabbed, and any similar or other publications. For further publications the delendant shall not publish or cause to be published or otherwise dissermate or distribute in any manner whatsoever, whether by way of the Internet or other medium, any statements or other communications which refer to the plaintiffs by name, depiction or description.

I also order a mandatory injunction to issue against the above-named. Defendant regarding construed publication in any manner whatsoever, whether by way of the Internet or other medium, any statements.

IN THE SUPREME COUNT OF HOW SOUTHAN thereby certify that the foregoing document is a true copy of the original.

Dated 7_ cay ci_tel2021124

Prognorpia,

Elaine L. J'Entremant

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Attorney (frame & Address) H				M.	S 3ar No. <u>1774</u>
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FUELTHER TEIS AFFIANT SAYETH NOC.

SWORN TO AND SUBSCRIBED before me, this the Oday of March, 2012.

NOTARY PUBLIC 10# 16491 Commission Septis April 2, 2013

My Commission Expires:

FUELTHER OF IS AFFIANT SAYEOR NOO.

HENRY LAIRD

NOTARY PUBLIC ID:: 16491 Committee Espens

SON COU

SWORN TO AND SUBSCRIBED before me, this the Oday of March, 2012.

Notary Public

My Commission Expires:

IN THE CIRCUIT COURT OF HANCOCK COUNTY

STATE OF MISSISSIPPI

TROUT POINT LODGE, LIMITED,)	
A Nova Scotia Limited Company;)	
VAUGHN PERRET and)	
CHARLES LEARY,)	
)	
Plaintif	f,)	
ν.)))	Civil Action No.: 12-0103
DOUG K. HANDSHOE,)	
Defenda	ınt.)	

NOTICE OF FILING NOTICE OF REMOVAL

Defendant, by its undersigned counsel, hereby gives notice that it has filed a Notice of Removal in the United States District Court for the Southern District of Mississippi in the case styled <u>Trout Point Lodge, Limited, A Nova Scotia Limited Company; Vaughn Perret and Charles Leary v. Doug K. Handshoe, Civil Action No. 12-0103.</u> A copy of the Notice of removal is attached as Exhibit "1".

DATED: March 23, 2012

G. GERALD CRUTHIRD, Esquire

Mississippi Bar No. 7926 G. GERALD CRUTHIRD, P.A.

Attorneys at Law
P. O. Box 1056
121 Fourth Street
Picayune, MS 39466
Telephone: (601) 798-0220

Facsimile: (601) 798-4591 Email: ggeraldc@bellsouth.net

COUNSEL FOR DEFENDANT

EXHIBIT

CERTIFICATE OF SERVICE

I hereby certify I have mailed (via U.S. Mail) a copy of the foregoing Notice of Filing Notice of Removal to the following:

Henry Laird, Esquire
Mississippi Bar No. 1774
Jones, Walker, Waechter, Poitevent,
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Gulfport, MS 39502
Telephone: (228) 864-3094
Escripile: (228) 864-0516

Facsimile: (228) 864-0516
Email: hlaird@joneswalker.com

Attorneys for Plaintiff

THIS the $\frac{2}{\sqrt{1 + 1}}$ day of March, 2012.

G. GERALD CRUTHIRD

	/2~0/03
SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 1. Article Addressed to: /2 - 0/03 Addressed to: /2 - 0/03	A. Signature X Junita Parell
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KAREN LADNER RUHR CIRCUT CLERK, HANCOCK CO BY

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MAR 12 20:2

KAREN LADNER RUHR
CIROUIT CLERK, HANCOCK CO.
BY

IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI

TROUT POINT LODGE, LIMITED, A Nova Scotia Limited Company; VAUGHN PERRET and **CHARLES LEARY**

PLAINTIFFS

VERSUS

CAUSE NO: 12-0103

DOUG K. HANDSHOE

DEFENDANT

CLERK'S NOTICE OF FILING FOREIGN JUDGMENT

Take notice that the Circuit Clerk of Hancock County, Mississippi has enrolled a judgment in favor of Plaintiffs/Judgment Creditors, Trout Point Lodge, Limited, Vaughn Perret and Charles Leary, whose post office address is 189 Trout Point Road, Kemptville, NS BOW 1Y0 Canada and whose attorney is Henry Laird of the law firm of Jones, Walker, Waechter, Poitevent, Carrère & Denègre, LLP, located at 2510 14th Street, Gulfport, Mississippi. The Defendant/Judgment Debtor is Doug K. Handshoe whose last known post office address is 345 Carroll Avenue, Bay St. Louis, Mississippi 39520, and this Notice of Filing Foreign Judgment is being mailed by the Hancock County, Mississippi Circuit Clerk to that address.

A true and correct copy of the Foreign Judgment is attached hereto as Exhibit "A".

This the $\mathcal{B}^{\mathcal{L}}$ day of March, 2012.

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DAMA DC



Trout Point Lodge, Limited, a Nova Scotia Limited Company, Vauchn Perret & Charles Leary

- and -

Doug K. Handshoe and Jane Doe

Defendants

FEB 0 2 2012

Plaintiff H JUSTY

ORDER

pfore the Honourable Justice Suzanne Hood in charrbers:

Amotion was made by Trout Point Lodge, Charles Leary, and Vaughan Perret for assessment of damages and injunctive relief against Doug K. Handshoe.

Having reviewed the affidavits of Charles Leary and Vaughan Perret, and having heard Charles Leary and Vaughan Perret on behalf of the Plaintiffs in chambers, on the motion of Trout Point Lodge, Charles Leary, and Vaughn Perret the following is ordered:

The Defendant Douglas K Handshoe of Mississippi as a joint and concurrent tortfeasor shall

pay to the plaintiffs the following damages:

to Trout Point Lodge: \$75,000 in general damages

to Vaughan Perret, \$100,000 in general damages; \$50,000 in aggravated damaged; and \$25,000 in punitive damages;

to Charles Leary, \$100,000 in general damages; \$50,000 in aggravated damaged; and \$25,000 in punitive damages;

as well as costs of \$2,000.

In addition, I order a permanent injunction to issue against the defendant, Douglas K. Handshoe, restraining him from disseminating, posting on the internet or publishing, in any manner whatsoever, directly or indirectly, any statements or comments about the plaintiffs, Trout Point Lodge, Charles L. Leary, and Vaughan J. Perret. This injunction shall include the publication, circulation and promotion on the blog named Stabbed, and any similar or other publications. For further particularity, the defendant shall not publish or cause to be published or otherwise disserrinate or distribute in any manner whatsoever, whether by way of the Internet or other medium, any statements or other communications which refer to the plaintiffs by name, depiction or description.

I also order a mandatory injunction to issue against the above-named. Defendant regarding continued publication in any manner whatsoever, whether by way of the Internet or other medium, any statements

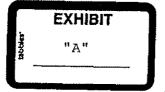
> IN THE SUPREME COURT OF NOVA SCOTIA i hereby certify that the foregoing document is a true copy of the original.

Dated 2 day of Teleplany

Prothonotary

Elaine L. d'Entremont

prottionotar;



Case 1:12-cv-00090-LG-JMR Document 2 Filed 04/03/12 Page 27 of 39

or other communications, which refer to the plaintiffs by name, depiction or description. All such material is hereby ordered to be immediately removed from publication.

Issued February 2.2012

Prothonotary

Elaine L. d'Entremont
Prothonotary

IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI

TROUT POINT LODGE, LIMITED, A Nova Scotia Limited Company; VAUGHN PERRET and CHARLES LEARY

PLAINTIFFS

VERSUS

CAUSE NO: <u>12-0103</u>

DOUG K. HANDSHOE

DEFENDANT

MOTION TO ENROLL FOREIGN JUDGMENT

COME NOW Plaintiffs/Judgment Creditors, Trout Point Lodge, Limited, Vaughn Perret and Charles Leary, and file this their Motion to Enroll Foreign Judgment against Defendant/Judgment Debtor, Doug K. Handshoe, and in support thereof would submit a true and correct copy of the Judgment as Exhibit "A" and the Affidavit of Henry Laird as Exhibit "B".

Respectfully submitted, this the 8th day of March, 2012.

Trout Point Lodge, Limited, Vaughn Perret and Charles Leary, Judgment Creditors

By:

Henry Lairy, Mississippi Bar No. 1774

FILED

MAR 0 8 2012

KAREN LADNER RUHR CIRCUIT CLERK, HANCOCK CO. D.C.

{GP000720.1}

CERTIFICATE OF SERVICE

I, Henry Laird, do hereby certify that I have this day mailed by United States mail, postage prepaid, a true and correct copy of the foregoing Motion to Enroll Foreign Judgment to the following:

Doug K. Handshoe 345 Carroll Avenue Bay St. Louis, Mississippi 39520

This the 8th day of March, 2012.

Henry Lard MSB# 1774

Jones, Walker, Waechter, Poitevent,

Carrère & Denègre, LLP

2510 14th Street, Suite 1125 (39501)

Post Office Drawer 160 Gulfport, MS 39502

Telephone: (228) 864-3094 Facsimile: (228) 864-0516

Email: hlaird@joneswalker.com

2011

IN THE SUPREME COURT OF NOVA SCOTIA BETWEEN:

Trout Point Lodge, Limited, a Nova Scotia Limited Company, Vaughn Perret & Charles Leary

- and --

Doug K. Handshoe and Jane Doe

Defendants

FEB 0 2 2012

Plaintiffe JUSTIC

Yar. No. 3536

ORDER

Before the Honourable Justice Suzanne Hood in chambers:

Amotion was made by Trout Point Lodge, Charles Leary, and Vaughan Perret for assessment of damages and injunctive relief against Doug K. Handshoe.

Having reviewed the affidavits of Charles Leary and Vaughan Perret, and having heard Charles Leary and Vaughan Perret on behalf of the Plaintiffs in chambers, on the motion of Trout Point Lodge, Charles Leary, and Vaughn Perret the following is ordered:

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In addition, I order a permanent injunction to issue against the defendant, Douglas K. Handshoe, restraining him from disseminating, posting on the Internet or publishing, in any manner whatsoever, directly or indirectly, any statements or comments about the plaintiffs, Trout Point Lodge, Charles L. Leary, and Vaughan J. Perret. This injunction shall include the publication, circulation and promotion on the blog named Stabbed, and any similar or other publications. For further particularity, the defendant shall not publish or cause to be published or otherwise disseminate or distribute in any manner whatsoever, whether by way of the Internet or other medium, any statements or other communications which refer to the plaintiffs by name, depiction or description.

I also order a mandatory injunction to issue against the above-named. Defendant regarding continued publication in any manner whatsoever, whether by way of the Internet or other medium, any statements

IN THE SUPREME COURT OF NOVA SCOTIA i hereby certify that the foregoing document is a true copy of the original.

Dated 7 day of telenrand,

Prothonotary

Elaine L. d'Entremont

EXHIBIT "A"

ON THE NOVA SCOTIANT BANGOOD TO THE NOVA SCOT

Case 1:12-cv-00090-LG-JMR Document 2 Filed 04/03/12 Page 31 of 39

or other communications which refer to the plaintiffs by name, depiction or description. All such material is hereby ordered to be immediately removed from publication.

Issued February 2, 2012

Elaine L. d'Entremont Prothonctary

Prothonotary

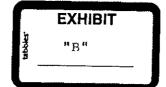
IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI

Limited Company; VAUGHN PERRET CHARLES LEARY	PLAINTIFFS	
VERSUS	CAUSE NO:	
DOUG K. HANDSHOE		
AFFIDAV	IT OF HENRY LAIRD	

STATE OF MISSISSIPPI COUNTY OF HARRISON

PERSONALLY APPEARED BEFORE ME the undersigned authority for the County and State aforesaid the within named Henry Laird of Jones, Walker, Waechter, Poitevent, Carrère & Denègre, LLP, says the following things are true:

- 1. He makes this Affidavit on personal knowledge, representations of the Plaintiffs and upon the Order entered February 2, 2012 in the Supreme Court of Nova Scotia styled: *Trout Point Lodge, Limited, a Nova Scotia Limited Liability Company, Vaughn Perret & Charles Leary-and-Doug K. Handshoe and Jane Doe*, Yar. No: 353654.
- 2. Attached hereto as Exhibit "A" is a true, correct and certified copy of the Judgment in favor of Trout Point Lodge, Limited, Vaughn Perret & Charles Leary against Doug K. Handshoe.
- 3. The name of the judgment debtor in the above styled case is Doug K. Handshoe, and last known post office address is 345 Carroll Avenue, Bay St. Louis, Mississippi 39520. The post office address of the judgment creditors, Trout Point Lodge, Charles Leary and Vaughn Perret is 189 Trout Point Road, Kemptville, NS BOW 1Y0 Canada.



{GP000691.1}

FURTHER THIS AFFIANT SAYETH NOT.

HENRY LAIRD

SWORN TO AND SUBSCRIBED before me, this the day of March, 2012.

NOTARY PUBLIC IOD 46491 Commission Expres

PARISON COUN

Votary Public

My Commission Expires:

			STATE OF THE STATE
COVER SHEET	Court Identification D	öcket # Case Year	Docket Number
Civil Case Filing Form			
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(To be completed by Attorney	CONTROL OF THE PARTY OF THE PAR	Court ID GH, ci, co)	
Prior to Filing of Pleading	7		local Docket ID
	103081	/ I/2 L	
Mississippi Supreme Court	Form AOC/01 Month Date		
Administrative Office of Courts	(Rev 2009) This area to be compl	eted by clerk	ase Number if filed prior to 1/1/94
In the CIRCUIT	Court of HANCOCK	County	Judicial District
Origin of Suit (Place an "X" In one box		nrolled Transfer from Other	court 🖂 Other
1 LON	nstated Foreign Judgment Er pened Joining Suit/Action	Appeal	
	·	<u>1—3</u>	
Plaintiff - Party(ies) Initially Bringing S	Suit Should Be Entered First - Enter Ac	dditional Plaintiffs on Separate Form	
Individual			- 10-10-10-10-10-10-10-10-10-10-10-10-10-1
Last Name	First Name		•
	r is acting in capacity as Executor(trix) or A	dministrator(trix) of an Estate, and enter style	:
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D/B/A or Agency	is acting in capacity as business Owner/Or	Delator (0/0/a/ of State Agency, and enter ent	**1
Business Trout Point Lodge, Ltd.		a group. If Composition indicate the ctotal	where incorporated
	name or business, corporation, partnership s filing suit in the name of an entity other t	o, agency - If Corporation, indicate the state w	mere micorporated
D/B/A	s filing soit in the name of an entity other t	man the above, and enter below.	
Address of Plaintiff 189 Trout Point F	Road, Kemptville, NS B0W 1Y0 Car	nada	1
Attorney (Name & Address) Henry Lai		MS 39502	MS Bar No. <u>1774</u>
Check (x) if Individual Filing in	itial Pleading is NOT an attorney		
Signature of Individual Filing:	1000		
Defendant - Name of Defendant - Ento	- A distant Data Managar	Form	
	ar Additional Defendants on Separate	FOIM	
Individual Handshoe	Boug	Maiden Name, if applica	M.I. Jr/Sr/III/IV
Last Name	First Name	Administrator(trix) of an Estate, and enter sty	******
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Check (x) if Individual Defenda	int is acting in capacity as Business Owner/	Operator (d/b/a) or State Agency, and enter of	entity:
D/B/A or Agency	in is seeing in separately as a services of the services,		ř
Business			
	azme of husiness cornoration, partnershir	o, agency - If Corporation, indicate the state w	here incorporated
	it is acting in the name of an entity other th		
D/B/A	tis details in the name of an entiry other to		
Attorney (Name & Address) - If Known			MS Bar No.
Damages Sought: Compensatory \$	Punitive \$	Check (x) if child support is	s contemplated as an Issue in this suit.*
		please submit completed Child Support Inforn	
Nature of Suit (Place an "X" in one box		Children/Minors Non-Domestic	Adverse Possession
Domestic Relations Child Custody/Visitation	Business/Commercial Accounting (Business)	Adoption - Contested Adoption - Uncontested	Ejectment
Child Support	Business Dissolution	Consent to Abortion Minor	Eminent Domain
Contempt	Debt Collection	Removal of Minority	Eviction
Divorce:Fault	Employment	Other	Judicial Foreclosure
Divorce: Irreconcilable Diff.	X Foreign Judgment	and the GIVI Rights of the Civil	Lien Assertion
Domestic Abuse	Garnishment	Elections	Partition
Emancipation	Replevin	Expungement	Tax Sale: Confirm/Cancel
Modification	Other	Habeas Corpus	Title Boundary or Easement
Paternity	Probate	Post Conviction Relief/Prisoner	Other
Property Division	Accounting (Probate)	Other	Tetts 1
Separate Maintenance	Birth Certificate Correction Commitment	Breach of Contract	Bad Faith Fraud
Termination of Parental Rights UIFSA (eff 7/1/97; formerly URESA)	Conservatorship	Installment Contract	Loss of Consortium
Other	Guardianship	Insurance	Malpractice - Legal
Other Architecture	1 accomming		Malpractice - Medical
(1) 2 a.	Heirship	Specific Performance	Maipractice - Medicar
	Heirship Intestate Estate	Specific Performance Other	Mass Tort
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Administrative Agency	Intestate Estate	Other	Mass Tort
Administrative Agency County Court	Intestate Estate Minor's Settlement	Other Statutes/Rules Bond Validation Civil Forfeiture	Mass Tort Negligence - General Negligence - Motor Vehicle Product Liability
Administrative Agency County Court Hardship Petition (Driver License)	Intestate Estate Minor's Settlement Muniment of Title	Other Statutes/Rules Bond Validation	Mass Tort Negligence - General Negligence - Motor Vehicle

		JUDICIAL DISTRICT	, CITY OF	-
Docket No File Yr F IN ADD	PLAINTIFFS IN REFE	RENCED CAUSE - I	Docket No. If Filed Prior to 1/1/94 Page 1 of Plaintiffs Pages CASE FILING FORM COVER SH	
Plaintiff #2:				
Individual: Perret	Vau	ighn	()	adle Init. Jr/Sr/III/IV
			or Administrator(trix) of an Estate, and	
	Road, Kemptville, NS I			
Check (/) if Individual	Plaintiff is acting in capa	acity as Business Owne	er/Operator (D/B/A) or State Agency, a	and enter that name below:
D/B/A				
BusinessEnter le	gal name of business, corporat	ion, partnership, agency - If C	orporation, indicate state where incorporated	
			er than the name above, and enter be	low:
ATTORNEY FOR THIS PLAINTIE	FF: <u>1774</u> Bar # or No	ame: <u>Henry Laird</u>	Pro Hac Vice (✓) t	Not an Attorney(✓)
Plaintiff #3:				
Individual: Leary	Cha	arles	()	odle Init. Jr/Sr/W/IV
			r Administrator(trix) of an Estate, and	
			er/Operator (D/B/A) or State Agency, a	
D/B/A				
Business	gal name of business, corporat	ion, partnership, agency - If C	orporation, indicate state where incorporated	
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ATTORNEY FOR THIS PLAINTIE	FF: <u>1774</u> Bar # or Na	ame: <u>Henry Laird</u>	Pro Hac Vice (✓)1	Not an Attorney(✓)
Plaintiff #4:				
Individual:	***	First Name	(Maiden Name, if Applicable Mi	ddle Init. Jr/Sr/lil/IV
			r Administrator(trix) of an Estate, and	
Check (/) if Individual I	Plaintiff is acting in capa	scity as Business Owne	er/Operator (D/B/A) or State Agency, a	and enter that name below:
Business	gal name of business, corporate	ion, partnership, agency - If C	orporation, indicate state where incorporated	
			er than the name above, and enter be	low:
ATTORNEY FOR THIS PLAINTIE	=e Bar#orNa	ame:	Pro Hac Vice (✓) !	Not an Attorney(✓)



Lawyers at Watkins Ludlam Winter & Stennis, P.A. joined the law firm of Jones Walker effective November 5, 2011, and will continue to provide legal services under the name of Jones Walker.

Henry F. Laird Not admitted in Alabama hlaird@joneswalker.com

March 8, 2012

Karen Ladner Ruhr Circuit Court Clerk 152 Main Street, Suite B Bay St. Louis, Mississippi 39520 FILED

MAR 0 8 2012

CIRCUIT CLERK, HANGOCK CO.

RE: Trout Point Lodge, Limited, a Nova Scotia Limited Company; Vaughn Perret and Charles Leary v. Doug K. Handshoe

Dear Ms. Ruhr:

Enclosed for filing please find the following:

- 1. Civil Cover Sheet and check in the amount of \$120.00 which represents payment of your filing fee;
- 2. Motion to Enroll Foreign Judgment;
- 3. Clerk's Notice of Filing Foreign Judgment.

I have attached extra copies of the aforementioned documents which I would appreciate your returning stamped "filed".

Henry F. 🗽

HFL Enclosures FEE BILL, CIVIL CASES, CIRCUIT COURT

State of Mississippi Hancock County

TROUT POINT LODGE, LIMITED ET AL VS HANDSHOE, DOUG K.

Case # 12-0103	Acct #	Paid By CHECK	302032	Rct# 25192
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	JURY TAX		3.00	
	COURT REPORTERS FEE		10.00	
	LAW LIBRARY		2.50	
	COURT ADMINISTRATOR		2.00	
	STATE CT ED FUND		2.00	
	COURT CONSTITUENTS		.50	
	ELECTRONIC COURT		10.00	
	LEGAL ASSISTANCE		5.00	

Total \$ 120.00

FOREIGN JUDGMENT

Payment received from Henry Laird PO Drawer 160

2510 14th St. Suite 1010

Gulfport MS 39502

Transaction 21863 Received 3/8/2012 at 13:49 Drawer 1 I.D. KATHARINE

Current Balance Due \$0.00

Receipt Amount \$ 120.00

D.C. Karen Ladner Ruhr, Circuit Clerk

Total Pages Printed	Records Processed	12-0103	12-0103	12-0103	12-0103	Case Number	Report ID CASE				Batch Frint !
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